



State of New Jersey
DEPARTMENT OF ENVIRONMENTAL PROTECTION

JON S. CORZINE
Governor

LISA P. JACKSON
Commissioner

APR 12 2006

Mr. Peter Mannino
Remedial Project Manager
U.S. Environmental Protection Agency – Region II
290 Broadway, 19th Floor
New York, N.Y. 10007-1866

RE: February 2006 RI/FS WorkPlan OU-3
Cornell-Dubilier Electronics Superfund Site

Dear Mr. Mannino:

NJDEP has reviewed the above indicated document and has the following comments:

Vapor Intrusion

1. It is stated (pg. 4-13) that the soil gas samples will be analyzed using an on-site mobile GC lab.
 - DC shall identify the analytical method to be used for the analysis of the soil gas samples. DC shall indicate if the mobile lab/analytical method is capable of achieving method detection levels below the soil gas screening levels.
 - Additionally, it is not appropriate to limit the analytical parameters, as proposed, during the initial rounds of a vapor intrusion investigation. The soil gas samples shall be analyzed for the full suite of volatiles (VO+10) based on the approved method as required in the Department's October 2005 Vapor Intrusion Guidance document.
 - DC shall indicate if the mobile lab is NJDEP Certified for the analytical method proposed to be utilized.
2. DC shall ensure that the lab selected to analyze the SUMMA canisters via method TO-15 is NJDEP Certified for that method.
3. The DEP recently updated (March 2006) Vapor Intrusion Guidance Document and associated screening levels tables. DC shall revise the screening levels contained in the report to reflect this revision as appropriate.

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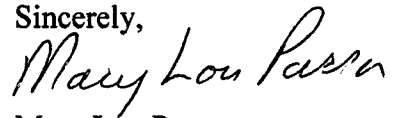


Groundwater

1. Section 2.6 & Attachment C (pg. 5-2) - The local health & water departments shall also be contacted as part of the well search.
2. Section 4.2.2.4 – Matrix diffusion testing will be conducted on rock core obtained from MW100 and 107. Rationale should be provided for selecting only 2 wells and these specific wells.
3. Section 4.2.2.5 & 4.2.3.5 – A table must be submitted for each event that includes the date, well or staff gauge number, measuring point elevation, depth-to-water and water elevation.
4. Section 4.2.3.3
 - a. Shallow bedrock wells will be advanced 30-50'. A field screening sample will then be collected at MW101 to 104, 106 and 108. Information for shallow wells MW107 and 109 will be obtained from adjacent deep wells. The apparent exclusion of MW100 and 105 must be addressed.
 - b. The geophysical logging results at the old production well should be used to determine the intervals (depths & number) and methods (i.e., field screening, packer testing, etc.) for the collection of ground water samples.
5. Section 4.2.3.7 - Low-flow sampling must be conducted according to procedures in the 8/05 DEP Field Sampling Procedures Manual (FSPM).
6. Attachment A
 - a. Section B.2.3 - The rationale for purging 10 packer interval volumes must be provided.
 - b. Section B.2.3 - The low-flow sampling data sheet (or equivalent) in the 8/05 DEP FSPM must be submitted for all low-flow sampling events.
 - c. Groundwater Sampling SOP – See comment #6 above.
 - d. Groundwater Sampling SOP – The stabilization criterion for temperature is $\pm 3\%$.
 - e. Monitoring Well Construction SOP – Development via the air-lift method is not recommended. Development should be accomplished via pumping and surge block.
7. Attachment B, Table 9-1 – The DEP Emergency Response telephone number should be included. It is 1-877-WARNDEP (1-877-927-6337).

If you have questions or comments concerning the above, please contact me at (609) 633-3618.

Sincerely,

A handwritten signature in black ink that reads "Mary Lou Parra". The script is fluid and cursive, with the first letters of each name being capitalized and prominent.

Mary Lou Parra
Site Manager

CC: Ken Petrone, BCM